

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Bobby L. Fisher	19-12649 MDC
<div style="text-align: right;">Debtor(s)</div> <hr/> CITIMORTGAGE, INC. C/O CENLAR, FSB Movant	Chapter 13 Proceeding
v. Bobby L. Fisher and William C. Miller, Esquire	
<div style="text-align: right;">Respondents</div>	

CERTIFICATION OF DEFAULT

CITIMORTGAGE, INC. C/O CENLAR, FSB, a secured creditor in the above captioned bankruptcy case, by and through its counsel, Jill Manuel-Coughlin, Esquire of the law firm of POWERS KIRN, LLC, hereby files this certification, and states:

1. I am the attorney responsible for handling the instant matter for CITIMORTGAGE, INC. C/O CENLAR, FSB, and I have sufficient knowledge to make this certification on its behalf.
2. On 07/27/2020, an Order was issued by this Court approving the Stipulation resolving CITIMORTGAGE, INC. C/O CENLAR, FSB's motion for relief from stay, a copy of which Order is attached hereto as **EXHIBIT A**. The Order provides for the cure of post-petition arrearage, and that in the event the Debtor fails to make the payments the secured creditor is permitted ex-parte relief to vacate the stay, with notice to the trustee, debtor(s), and debtor's attorney, if any.
3. Debtor(s) has/have failed to comply with the aforesaid order by either missing payments and/or by failing to make the correct payments as summarized on the Notice of Default which was sent to all interested parties on 02/12/2021. A copy of the Notice of Default is attached as **EXHIBIT B**.
4. This certification is being made in an effort to enforce the prior order of this court and to vacate the stay without numerous court appearances.
5. I certify the above statements to be true. I am aware that if the above statements are willfully false, I am subject to punishment.

RESPECTFULLY SUBMITTED,
POWERS KIRN, LLC

Dated: March 11, 2021

By: /s/ Jill Manuel-Coughlin

Jill Manuel-Coughlin, Esquire

ID# 63252

Eight Neshaminy Interplex, Suite 215

Trevose, PA 19053

Telephone: 215-942-2090

Attorney for Movant